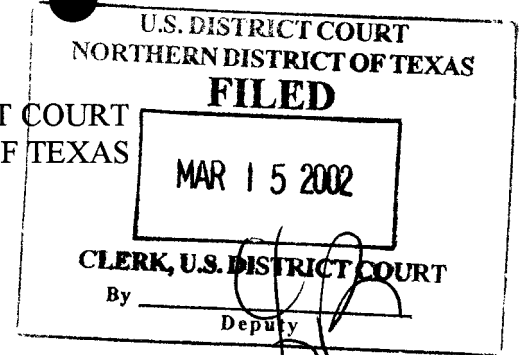


ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



ROBERT N. GOLDSTEIN,

Plaintiff,

v.

PHILIP ALEXANDER GORDON and  
WWW.CHEATERS.COM,

Defendants.

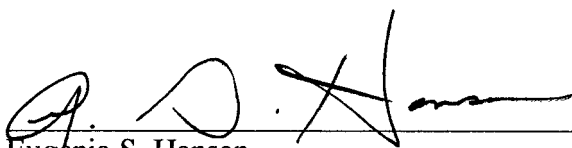
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Civil Action No. 3:00-CV-0022-P

**DEFENDANT PHILIP ALEXANDER GORDON'S**  
**FEE PETITION WITH SUPPORTING AFFADAVIT PURSUANT**  
**TO THE COURT'S ORDER OF FEBRUARY 27, 2002**

Defendant, Philip Alexander Gordon, hereby presents his petition for attorney fees and costs incurred in connection with his motion to set aside the default judgment and motion for sanctions under Rule 11. These motions were granted by the Court on February 27, 2002 along with an Order for reimbursement of such fees by Plaintiff.

This petition is supported by the attached Affidavit of Eugenia S. Hansen.

  
Eugenia S. Hansen  
SIDLEY AUSTIN BROWN & WOOD, LLP  
717 North Harwood, Suite 3400  
Dallas, Texas 75201  
214/981-3315

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ROBERT N. GOLDSTEIN,

Plaintiff,

v.

PHILIP ALEXANDER GORDON and  
WWW.CHEATERS.COM,

Defendants.

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Civil Action No. 3:00-CV-0022-P

**AFFIDAVIT OF EUGENIA S. HANSEN  
FOR ATTORNEY FEES AND COSTS**

I, Eugenia S. Hansen, being first duly sworn, on oath depose and state as follows:

1. I am an adult resident of the State of Texas.
2. I am an attorney duly licensed and authorized to practice law in the State of Texas.
3. I am a partner in the law firm of Sidley Austin Brown & Wood LLP, Dallas, Texas and I am one of the attorneys of record in this action representing Defendant Philip Alexander Gordon (hereinafter "Gordon").
4. I make this Affidavit on the basis of my personal knowledge of the facts set forth herein.
5. I make this Affidavit in support of Gordon's request for attorney fees and costs, wherein Gordon seeks recovery of the attorney fees and costs incurred by Defendant in connection with the filing of its motion to set aside the default judgment and motion for sanctions.

6. Gordon incurred \$15,511.25 in attorney fees in connection with the filing of his motion to set aside the default judgment, which are summarized below:

a.	Eugenia S. Hansen, partner	6.50 hours x \$375/hour, for \$ 2,437.50;
b.	John A. Dondrea, partner	10.25 hours x \$375/hour, for \$ 3,843.75;
c.	William C. Shear, associate	41.00 hours x \$205/hour, for \$ 8,405.00;
d.	Janna G. Burris, legal assistant	<u>5.50</u> hours x \$150/hour, for <u>\$ 825.00</u>
	Total	63.25 hours \$15,511.25

7. Gordon incurred \$20,946.25 in attorney fees in connection with the filing of his motion for sanctions under Rule 11, which are summarized below:

a.	Eugenia S. Hansen, partner	13.75 hours x \$375/hour, for \$ 5,156.25;
b.	John A. Dondrea, partner	9.50 hours x \$375/hour, for \$ 3,562.50;
c.	William C. Shear, associate	53.00 hours x \$205/hour, for \$10,865.00;
d.	Julie M. Nichols, summer associate	4.00 hours x \$125/hour, for \$ 500.00; and
e.	Janna G. Burris, legal assistant	<u>5.75</u> hours x \$150/hour, for <u>\$ 862.50.</u>
	Total	86.00 hours \$20,946.25

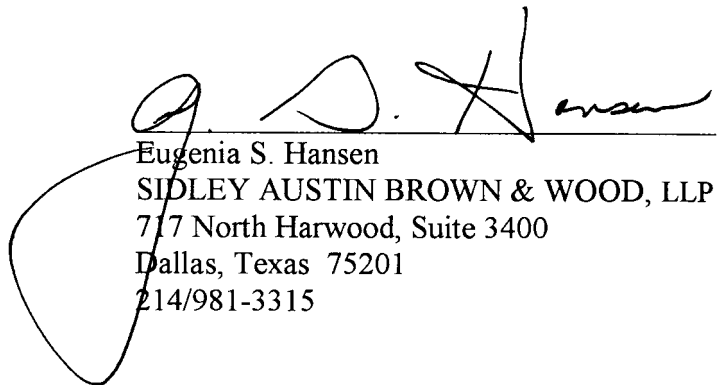
8. Gordon incurred costs in the amount of \$747.10 for online legal research related to the filing of his motions to set aside the default judgment and for sanctions under Rule 11.

9. Gordon incurred costs in the amount of \$302.92 for duplication costs associated with preparing, filing and serving the motion to set aside the default judgment and the motion for sanctions.

10. Gordon incurred costs in the amount of \$189.02 for facsimile and courier costs associated with filing and serving the motion to set aside the default judgment and the motion for sanctions.

Attached hereto are copies of the relevant documents supporting said fees and costs, which were reasonably and necessarily incurred in connection with the filing of the motion to set aside the default judgment and the motion for sanctions. The attorney fees associated with the motion to set aside the default judgment are highlighted in yellow. The attorney fees associated with the motion for sanctions are highlighted in blue.

Further Affiant sayeth naught.

  
Eugenia S. Hansen  
SIDLEY AUSTIN BROWN & WOOD, LLP  
717 North Harwood, Suite 3400  
Dallas, Texas 75201  
214/981-3315

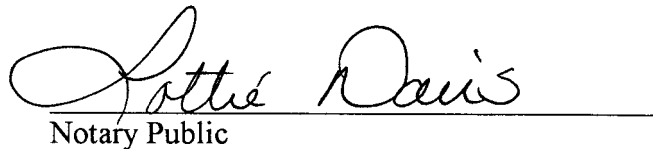
STATE OF TEXAS

COUNTY OF DALLAS

Before me, Lottie Davis, Notary Public, on this day personally appeared Eugenia S. Hansen, known to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that she executed the same for the purposes therein expressed.

Given under my hand and seal of office this 15<sup>th</sup> day of March, 2002.



  
Notary Public